

**Case No.: C 07-01075 SC**  
**SENORX V. COUDERT BROTHERS LLP AND DOES 1 – 500**

**EXHIBIT “A”**  
**of Declaration of Diana M. Estrada in Support of Defendants’**  
**Opposition**

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

## PROOF OF CLAIM

<b>Debtor Name</b> Coudert Brothers LLP		<b>Case Number</b> 06-12226		<b>This Space For Court Use Only</b> <input checked="" type="checkbox"/> Date Stamped Copy Returned <input type="checkbox"/> No self addressed stamped envelope <input type="checkbox"/> No copy to return The Debtor has listed your claim as Contingent, Unliquidated, and Disputed on Schedule F as a General Unsecured claim in an unknown amount. Claim #00177 USBC SDNY Coudert Brothers LLP 06-12226 (RDD)	
NOTE: This form should not be used to make a claim for an administrative expense arising after the commencement of the case. A "request" for payment of an administrative expense may be filed pursuant to 11 U.S.C. § 503.					
<b>Name of Creditor (The person or other entity to whom the debtor owes money or property):</b> SENORX INC		<input type="checkbox"/> Check box if you are aware that anyone else has filed a proof of claim relating to your claim. Attach copy of statement giving particulars.  <input type="checkbox"/> Check box if you have never received any notices from the bankruptcy court in this case.  <input type="checkbox"/> Check box if the address differs from the address on the envelope sent to you by the court.		<b>Received</b> JAN 31 2007 <b>Kurtzman Carson</b> This Space For Court Use Only	
<b>Name and Address where notices should be sent:</b> SENORX INC C/O MICHAEL PUIZE ESQ 11755 WILSHIRE BLVD, Ste. 1170 LOS ANGELES CA 90025  <b>Telephone Number:</b> (310) 312 1102					
<b>Last four digits of account or other number by which creditor identifies debtor:</b> N/A		Check here <input type="checkbox"/> replaces if this claim <input type="checkbox"/> amends a previously filed claim dated: _____			
<b>1. Basis for Claim</b> <input type="checkbox"/> Goods sold <input type="checkbox"/> Services performed <input type="checkbox"/> Money loaned <input type="checkbox"/> Personal injury/wrongful death <input type="checkbox"/> Taxes <input checked="" type="checkbox"/> Other Legal malpractice claim- pending					
<input type="checkbox"/> Retiree benefits as defined in 11 U.S.C. § 1114(a) <input type="checkbox"/> Wages, salaries, and compensation (fill out below) Last four digits of your SS #: _____ Unpaid compensation for services performed from _____ to _____ (date) (date)					
<b>2. Date debt was incurred:</b> N/A Claim awaiting trial- malpractice occurred on May 20, June 28 and June 29, 2003					
<b>3. If court judgment, date obtained:</b>					
<b>4. Classification of Claim.</b> Check the appropriate box or boxes that best describe your claim and state the amount of the claim at the time case filed. See reverse side for important explanations. <input checked="" type="checkbox"/> <b>Unsecured Nonpriority Claim</b> - unliquidated and presently undetermined but in excess of \$25,000,000.00 <input checked="" type="checkbox"/> Check this box if: a) there is no collateral or lien securing your claim, or b) your claim exceeds the value of the property securing it, or if c) none or only part of your claim is entitled to priority.					
<input type="checkbox"/> <b>Secured Claim.</b> <input type="checkbox"/> Check this box if your claim is secured by collateral (including a right of setoff). Brief Description of Collateral: <input type="checkbox"/> Real Estate <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Other _____ Value of Collateral \$ _____ Amount of arrearage and other charges at time case filed included in secured claim, if any: \$ _____					
<input type="checkbox"/> <b>Unsecured Priority Claim.</b> <input type="checkbox"/> Check this box if you have an unsecured claim, all or part of which is entitled to priority Amount entitled to priority \$ _____  Specify the priority of the claim: <input type="checkbox"/> Domestic support obligations under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B). <input type="checkbox"/> Wages, salaries, or commissions (up to \$10,000),* earned within 180 days before filing of the bankruptcy petition or cessation of the debtor's business, whichever is earlier - 11 U.S.C. § 507(a)(4). <input type="checkbox"/> Contributions to an employee benefit plan - 11 U.S.C. § 507(a)(5).					
<input type="checkbox"/> Up to \$2,225* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use - 11 U.S.C. § 507(a)(7). <input type="checkbox"/> Taxes or penalties owed to governmental units - 11 U.S.C. § 507(a)(8). <input type="checkbox"/> Other - Specify applicable paragraph of 11 U.S.C. § 507(a)(____). * Amounts are subject to adjustment on 4/1/07 and every 3 years thereafter with respect to cases commenced on or after the date of adjustment.					
<b>5. Total Amount of Claim at Time Case Filed:</b> <u>\$unliquidated &amp; presently undetermined but in excess of \$25 million</u> (Unsecured) (Secured) (Priority) (Total) \$25,000,000.					
<input type="checkbox"/> Check this box if claim includes interest or other charges in addition to the principal amount of the claim. Attach itemized statement of all interest or additional charges.					
<b>6. Credits:</b> The amount of all payments on this claim has been credited and deducted for the purpose of making this proof of claim. <b>7. Supporting Documents:</b> Attach copies of supporting documents, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, court judgments, mortgages, security agreements, and evidence of perfection of lien. DO NOT SEND ORIGINAL DOCUMENTS. If the documents are not available, explain. If the documents are voluminous, attach a summary. Amended Complaint is attached as Exhibit 1.					
<b>8. Date-Stamped Copy:</b> To receive an acknowledgment of the filing of your claim, enclose a stamped, self-addressed envelope and copy of this proof of claim Attached.					
<b>Date:</b> 1-26-07		Sign and print the name and title, if any, of the creditor or other person authorized to file this claim (attach copy of power of attorney, if any): Law Offices of Michael J. Puize on behalf of creditor SENORX Geraldine Weiss Esq.			

Penalty for presenting fraudulent claim: Fine up to \$500,000 or imprisonment for up to 5 years, or both. 18 U.S.C. §§ 152 and 3571



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**of Declaration of Diana M. Estrada in Support of Defendants’**  
**Opposition**

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re: : Chapter 11  
 :  
COUDERT BROTHERS LLP, : Case No. 06-12226 (RDD)  
 :  
Debtor. :  
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**ORDER EXTENDING 90-DAY PERIOD WITHIN WHICH THE  
DEBTOR MAY REMOVE CIVIL ACTIONS UNDER 28 U.S.C. §  
1452 AND BANKRUPTCY RULE 9027(a)**

Upon the Application<sup>1</sup> of Coudert Brothers LLP (the "Debtor"), the debtor and debtor in possession, dated December 1, 2006, by its attorneys, Klestadt & Winters, LLP, for entry of an order extending by 90 days the 90 days period within which the Debtor may remove civil actions under 28 U.S.C. § 1452 and Bankruptcy Rule 9027(a), and no adverse interest being represented; and a hearing on the Application having been held before this Court on December 20, 2006; and sufficient cause appearing therefor, and it further appearing that sufficient notice of the Application as required having been given, it is

ORDERED that the Application be, and hereby is, granted in all respects; and it is further

ORDERED that, pursuant to Bankruptcy Rule 9006(b)(1), the time within which the Debtor may remove Civil Actions under 28 U.S.C. § 1452 and Bankruptcy Rule 9027(a) is extended by 90 days, through and including March 21, 2007; and it is further

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<sup>1</sup> All capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Application.

ORDERED that this Order is without prejudice to the Debtor moving for further extensions of the time within which it may remove Civil Actions pursuant to Bankruptcy Rule 9027(a) and Section 1452.

Dated: New York, New York  
December 20, 2006

/s/Robert D. Drain

**UNITED STATES BANKRUPTCY JUDGE**